



*American Rivers*  
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October 30, 2003

G. Tracy Mehan, III  
Assistant Administrator, Office of Water  
US Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Re: Water Efficiency Labeling

Dear Mr. Mehan:

Thank you for the opportunity to participate in the Environmental Protection Agency's stakeholder meeting regarding Water Efficient Product Market Enhancement on October 9, 2003. I provided oral comments at that meeting, and am now submitting these additional comments for the record.

American Rivers is very pleased that EPA is considering development of a labeling system for water efficiency. We believe that increasing the efficiency of our water consumption is critical not only to ensure the public has access to sufficient clean water now and in the future, but also to ensure that our rivers, wetlands and lakes retain sufficient water to sustain fish, wildlife and all of the ecosystem services provided by healthy freshwater systems.

As you know, water scarcity has emerged as a preeminent environmental challenge in this century. This scarcity is caused not only by climate change and continuing drought in many areas of the country. It is magnified by a century of rapidly rising water consumption coupled by significant changes to water supplies due both to increased construction of hard surfaces that disrupt the natural hydrologic cycle and to widespread destruction of wetlands and headwater streams that assure a reliable supply of clean fresh water.

Improved efficiency can reduce water use without lowering the public's standard of living. The World Water Council has named the United States the most inefficient water user of 147 countries studied, including European countries that enjoy standards of living comparable to ours. Labeling of water efficient products would represent a significant step forward in moving the nation towards more efficient water use.

American Rivers has some specific recommendations for developing this system. *First*, it is understandable as this labeling system is created to initially focus on domestic products (e.g., washing machines, dishwashers). But to be effective, the labeling system cannot stop there. In fact, according to one presenter at the stakeholder meeting, much of the water efficiency gains in products have already been achieved through increasing energy efficiency as tracked by EPA's Energy Star label.

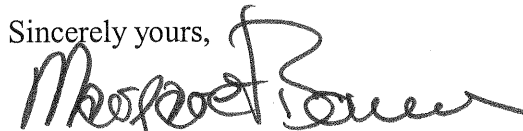
To be effective at reducing the nation's water consumption, EPA's water efficiency labeling system must include the following practices that currently waste water:

- a. *Outside domestic consumption:* The majority of water use at an average home is consumed outside the house through lawn irrigation, car washing, *etc.* As such, EPA's labeling system must look at domestic water use both inside and outside the house.
- b. *Stormwater management:* In most places in the country, stormwater is still treated as a waste product and removed from the landscape as fast as possible. But this prevents use of stormwater as a valuable resource in recharging aquifers. There are many "soft path" solutions available to manage stormwater while maximizing aquifer recharge where safe and appropriate. A labeling system for these practices will help to increase their use, and thus stem the loss of groundwater under sprawling suburbs nationwide.
- c. *Agricultural practices:* Irrigated agriculture is by far the largest consumer of water in the United States, accounting for 85 percent of the freshwater consumed in the country – and wasting much of it. EPA's water efficiency labeling system should not ignore the gorilla of water consumption hiding in the closet by not including labeling of agricultural practices and equipment.
- d. *Whole buildings:* Eventually, we recommend that the labeling system move from just looking at the various components of a water efficient home, to also looking at building design and construction as a whole to measure its overall efficiency. The benefits of this whole building labeling are broad. An example was given at the stakeholder meeting where new building designs are given bonus points if they met a certain efficiency standard, and are thus provided some fast track benefits in the building permit process.

*Second*, as with the EPA's Energy Star Program, a water efficient labeling program should be much more than the efficiency label. Some of the additional components that American Rivers recommends adding to a water efficient labeling program are: (a) Public education; (b) Training of sales people who sell products that include the water efficiency label; and (c) Requirements that government procurement programs only purchase products that score a certain level on their water efficiency label.

Again, thank you for the opportunity to participate in this initial stakeholder process. We look forward to continuing to work with you as you develop this system. Please add me to your distribution list for future information about this program.

Sincerely yours,



Margaret B. Bowman  
Deputy Vice President for Conservation

cc: Public comment docket, wemonth@epa.gov